

addressed. Noise problems along the rail line will not be attenuated with sound walls. And, federal government participation/investment in terminal development will be lost and so will the associated benefits. So, the consultant believes Rail Strategy 1 does not address the purpose of the project as it does not create a regional intermodal facility with equitable treatment of all Class I railroads. Nor does it provide sufficient capacity for future demand. Finally, it is not associated with positive community effects overall.

The consultant believes RS 2 will offer some outcomes more positive than Rail Strategy 1 and it will meet the project's purpose. But, it does not meet expected intermodal demand nor does it offer community benefits of significance. For example, while no EPA pollutant standards are expected to be exceeded, and the terminal surface would likely be paved, community cohesion will be negatively impacted as Lonyo and Central will still cross the rail yard at grade. And, while noise impacts are likely to be mitigated by building a sound wall, limited federal and/or state investments outside the terminal will diminish benefits to the community that would otherwise flow through a more cost-effective strategy.

On the other hand, if the terminal is expanded to accommodate consolidation of regional intermodal activity by equitably treating all four Class I railroads (i.e., Rail Strategy 3), then a federal/state investment of over \$100 million outside the rail yard will benefit the community.¹ Traffic and safety problems at Lonyo and Central would be addressed by grade-separating these streets from the rail lines. Noise issues would be addressed by a buffer along the perimeter road and a sound wall along the truck-only road. The truck-only road located on railroad property would capture DIFT trucks that would otherwise use Livernois, Dagoon and other local streets degrading those environments. At the same time, building the truck-only road would include improvements to bridges and underpasses that will address drainage problems which have long plagued the community at Central, Green, Waterman and Dix. And the terminal surface will be paved. This will also likely foster positive regional effects in air quality and on the economy to cite two examples. In effect, Rail Strategy 3 represents an investment in southwest Detroit/east Dearborn at the location of its biggest neighbor by forming a partnership among the railroads, government, and the community to continue creating a sustainable environment.

¹It is expected that \$80-\$100 million (2001 dollars) will be invested inside the rail terminal by government in combination with the railroads.

4. Consultant's Recommendation

In light of these expected conditions, the consultant recommends to MDOT that it move to the next step because it believes the study results demonstrate that the Detroit Intermodal Freight Terminal Project is feasible. In moving forward, an Environmental Impact Statement is the proposed course of action. Federal guidance (40 CFR Parts 1500-1508) offers several "triggers" in deciding whether to prepare an Environmental Impact Statement. Two are evident.

1. The effects on the quality of the human environment are likely to be highly controversial.
2. The action may establish a precedent for future actions which represents a decision in principle about a future consideration.

Additionally, work to date indicates that over six dozen businesses could be displaced, a number of which are located on sites with some known contamination.¹ So, the DIFT Project could create a significant displacement impact which, through remediation of soil contamination at a number of properties, may be beneficial on balance. This condition is yet a third trigger which supports preparation of an Environmental Impact Statement (EIS). The consultant recommends a "notice of intent" to prepare the EIS be published in the *Federal Register* soon.

If the EIS is prepared, focus should be on Rail Strategy 3 and No-Action. The rationale for eliminating Rail Strategy 2 would also be

documented. Adjustments to RS 3 to further improve its fit with the community and its cost effectiveness would be undertaken and include: moving the truck-only road farther into the rail property, by relocating some tracks, to further address the noise issue; and, channeling Lonyo over the perimeter road to Central so only one underpass of the rail terminal would be needed while access to the neighborhoods north and south would be maintained. The perimeter road should also be refined in an effort to further reduce land that could be acquired for the terminal's expansion. Figure 4-1 illustrates a concept that could reduce land acquisition by 35± acres and seven business properties. The land outside the revised perimeter road could then be used to relocate some residences and businesses affected by the project that choose to stay in the area.

The EIS should pay particular attention to the following issues:

- Acquisition/Relocation
- Social Impacts/Community Cohesion
- Economic Impacts
- Environmental Justice
- Noise
- Secondary/Indirect Effects
- Parklands, particularly St. Hedwig Playfield
- Historic/Archaeologic and Cultural Resources
- Hazardous Waste/Materials

The community's involvement in the DIFT study process is critical. That input can be provided at the open forum meeting to be held at LA SED, 7150 W. Vernor, from 4:30 to 8:30 p.m. on December 13.

¹ There are hundreds of businesses in the study area.

